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Attorney for Defendant  
ANDRE WARREN, JR.

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANDRE WARREN, JR.,

Defendant,

)  
) Case No. 2:22-CR-00058-DJC  
)  
) **STIPULATION AND ORDER**  
) **RE:TEMPORARY RELEASE FROM**  
) **CUSTODY TO VISIT AILING MOTHER**  
) **PURSUANT TO 18 U.S.C. § 3142(i)**

Andre Warren, Jr., through his counsel of record, and Assistant United States Attorney Alexis Klein, hereby stipulate that this Court grant Mr. Warren, Jr. temporary release pursuant to 18 U.S.C. §3142(i) from 8:00 a.m. on April 8, 2024 to 5:00 p.m. on April 8, 2024. The purpose of the release is to allow the defendant to visit his ailing mother who has recently been moved into hospice care as a result of her cancer. The hospice home address will be provided to the Court separately.

Mr. Warren, Jr. will remain in the care, custody and control, and within eyesight of his attorney, Danica Mazenko, or the defense investigator, Kristin Hansen, for the entire duration of his release. Mr. Warren, Jr. will abide by all laws, and will not consume any alcohol or controlled substance, prescribed or not, during the period of his temporary release. He will not possess or

1 have access to any dangerous or deadly weapons, firearms, or ammunition, nor have any contact  
2 or association with any co-defendant. While on temporary release, the defendant shall not harass,  
3 threaten, intimidate, tamper with, or retaliate against any witness, victim, or officer of the court,  
4 or obstruct any criminal investigation.

5 Mr. Warren, Jr. will not meet with any other people during his temporary release other  
6 than being with Ms. Mazenko or Ms. Hansen and in the presence of those at his mother's home  
7 hospice location.  
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9 Ms. Mazenko or Ms. Hansen will contact Pretrial Services and the United States Marshals  
10 immediately should any issue arise during the release period.

11 The purpose of Mr. Warren, Jr.'s temporarily release from custody at the Nevada County  
12 Jail is for him to visit his ailing mother in hospice care. The request is that he be temporarily  
13 released on Monday, April 8, 2024 at 8:00 a.m. to the custody of Danica Mazenko or defense  
14 investigator Kristin Hansen, and return to the Nevada County Jail no later than 5:00 p.m. that  
15 same day. He would travel from the Nevada County Jail directly to home hospice location and  
16 return to the jail.<sup>1</sup> There would be no other stops than as needed for the restroom or sustenance.  
17

18 It is hereby stipulated and agreed between Plaintiff, United States of America, and  
19 defendant, Mr. Warren, Jr., through their attorneys, that Mr. Warren, Jr. may be temporarily  
20 released from custody as set forth below to visit his ailing mother in hospice care in the third-  
21 party custody of his attorney, Danica Mazenko, or the defense investigator, Kristin Hansen on  
22 all the terms and conditions outlined above.  
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24 The parties agree that the Court may order Mr. Warren, Jr. temporarily released at 8:00  
25 a.m. on Monday, April 8, 2024, with instructions he return to the jail by 5:00 p.m. the same day.  
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28 <sup>1</sup> It is 86 miles one-way from the Nevada County Jail to the home hospice location.

1 The Court shall direct the United States Marshals Service to coordinate Mr. Warren's release and  
2 surrender with the jail as they see fit, within the time frame permitted above. Mr. Warren, Jr.  
3 will sign the attached Notice to Defendant Being Released (modified to fit the conditions of this  
4 temporary release) which defense counsel will submit to the Courtroom Deputy for filing before  
5 April 8, 2024.

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8 Respectfully submitted,

9 Dated: April 3, 2024

/s/Danica Mazenko  
DANICA MAZENKO  
Attorney for Defendant  
ANDRE WARREN, JR.

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14 Dated: April 3, 2024

/s/ Alexis Klein  
ALEXIS KLEIN  
Assistant United States Attorney

**ORDER**

Pursuant to 18 U.S.C. §3142(i), Andre Warren, Jr, is ordered temporarily released from custody at 8:00 a.m. on Monday, April 8, 2024, to Danica Mazenko or Kristin Hansen, and Andre Warren, Jr. is further ordered to surrender himself to the Nevada County Jail by 5:00 p.m. that day. The United States Marshals Service is directed to make necessary arrangements with the Nevada County Jail for Mr. Warren's release and surrender.

Upon temporary release, Mr. Warren, Jr. will remain with a third party custodian, Danica Mazenko or Kristin Hansen, at all times. Mr. Warren, Jr. will abide by all laws, and will not consume any alcohol or controlled substance, prescribed or not, during the period of his temporary release. He will not possess or have access to any dangerous or deadly weapons, firearms, or ammunition, nor have any contact or association with any co-defendant. While on temporary release, the defendant shall not harass, threaten, intimidate, tamper with, or retaliate against any witness, victim, or officer of the court, or obstruct any criminal investigation.

Mr. Warren, Jr. will not meet with any other people during his temporary release other than being with Ms. Mazenko or Ms. Hansen and in the presence of those at his mother's healthcare facility.

Ms. Mazenko or Ms. Hansen will return Mr. Warren, Jr. to the Nevada County Jail by 5:00 p.m. on April 8, 2024. Danica Mazenko or Kristin Hansen are ORDERED to notify the government and Pretrial Services immediately if Mr. Warren, Jr. is non-compliant with the conditions of his release.

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1 Mr. Warren, Jr. is ordered to sign the attached Notice to Defenant Being Released and file  
2 it with the Court before his release. All conditions set forth in that notice are hereby ordered.

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4 IT IS SO ORDERED.

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6 Dated: April 4, 2024

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9 CAROLYN K. DELANEY  
10 UNITED STATES MAGISTRATE JUDGE  
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